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12 **UNITED STATES DISTRICT COURT**

13 **FOR THE DISTRICT OF NEVADA**

14 DELANIE BUTLER and JOHN ROBINSON,
15 individually and on behalf of all similarly
16 situated class and collective action members,

17 Case No.: 2:20-cv-00861-JCM-EJY

18 Plaintiffs,

19 vs.

20 PORTFOLIO RECOVERY ASSOCIATES,
21 LLC, a Delaware Limited Liability Company;
22 DOES I through X, inclusive; ROE
23 CORPORATIONS I through X inclusive,

24 **STIPULATION AND ORDER TO
EXTEND DEADLINES SET FORTH IN
THE COURT'S IMPLEMENTATION
SCHEDULE TO THE ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT (ECF NO. 63)**

25 Defendants.

26 Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1 and LR 26-3, Plaintiffs Delanie Butler and John
27 Robinson (collectively, "Plaintiffs") and Defendant Portfolio Recovery Associates, LLC
28 ("Defendant"), by and through undersigned counsel, hereby stipulate and jointly request to extend
the deadlines set forth in the Court's Implementation Schedule (ECF No. 63) by extending those
deadlines for a period of forty-five (45) days. This is the parties' first request for an extension of
these deadlines.

Good cause exists to extend the deadlines contained in the Court's Implementation Schedule.
Defendant has been in the process of gathering and finalizing the class data for purposes of sending
to the third-party administrator to circulate notice and needs the additional time to do so.

Given the need to continue the deadlines forty-five (45) days, the Parties are also seeking to continue the Final Fairness Hearing, presently scheduled for August 10, 2022 and related deadlines to allow the third-party administrator time to send the class notice and have the class members submit exclusion forms should they wish to do so. If granted, the new deadlines are as follows:

	DEADLINE	CURRENT DATE	REVISED DATE
a.	Deadline for Defendant to Submit Class Member Information to Claim Administrator	June 14, 2022	July 29, 2022
b.	Deadline for Claims Administrator to Mail the Notice to Class members	June 28, 2022	August 12, 2022
c.	Deadline for Class Members to Postmark Requests for Exclusions	July 28, 2022	September 12, 2022
d.	Deadline for Receipt by Court and Counsel of any Objections to Settlement	July 28, 2022	September 12, 2022
e.	Deadline for Counsel to file Motion for Final Approval of Settlement, Attorneys' Fees and Costs, and Enhancement Award	August 3, 2022	September 21, 2022 [7 calendar days before Final Approval Hearing]
f.	Deadline for Counsel to File Declaration from Claims Administrator of Due Diligence and Proof of Mailing	August 3, 2022	September 21, 2022 [7 calendar days before Final Approval Hearing]
g.	Final Fairness Hearing	August 10, 2022	September 28, 2022 at 10:00 a.m.
h.	Deadline for Defendant to Fund Settlement Account maintained by Claims Administrator	August 31, 2022	October 19, 2022 [21 calendar days after Effective Date/Final Fairness Hearing]
i.	Deadline for Claims Administrator to wire transfer the Attorneys' Fees and Costs to Class Counsel (if Settlement is Effective)	September 5, 2022	, 2022 [5 calendar days after Defendant Funds Settlement Account]
j.	Deadline for Claims Administrator to mail the Settlement Awards to Class Members and the Enhancement Awards to Class Representatives (if Settlement is Effective)	September 10, 2022	[10 days after Defendant Funds Settlement Account]
k.	Claims Administrator to File Proof of Payment of Settlement Awards, Enhancement Awards, Attorneys' Fees and Costs (if Settlement is Effective)	November 8, 2022	, 2022 [90 calendar days after Effective Date]

1	1. Deadline checks paid to Claimants shall remain valid and negotiable	March 9, 2023	_____, 2023 [180 calendar days from the date of issuance]
5	m. Deadline for Settlement Administrator to release uncashed funds back to Defendant	May 1, 2023	_____, 2023

7 This Stipulation is made in good faith and is not intended for purposes of delay.

8 DATED this 21st day of July, 2022.

9 HUTCHINGS LAW GROUP, LLC

11 */s/ Mark H. Hutchings*

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14 300 S. 4th Street, Suite 1400
15 Las Vegas, NV 89101
16 *Attorney for Plaintiffs*

17 IT IS ORDERED that the Final
Fairness Hearing is continued to
September 28, 2022, at 10:00 a.m.

19 IT IS SO ORDERED.

8 DATED this 21st day of July, 2022.

9 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

11 */s/ Dana B. Salmonson*

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21 **ORDER**

22 
UNITED STATES DISTRICT COURT JUDGE

23 August 4, 2022

24 DATED